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The Chemical Company

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August 14, 2012

**Via Federal Express**

United States Environmental Protection Agency - East
Attn: TSCA Section 8(e)
Room 6428
1201 Constitution Avenue, NW
Washington, DC 20004

Subject: Notice in Accordance with TSCA Section 8(e): Results of a Combined Repeated Dose Reproduction Toxicity Screening Test in Wistar Rats with Phenol, 2,2'-[(1-methyl-1,2-ethanediyl)bis(nitrilomethylidyne)]bis-)bis- (CAS No. 94-91-7)

Dear Section 8(e) Coordinator:

BASF Corporation is submitting results of a Combined Repeated Dose Reproduction Toxicity Screening Test (OECD TG no 422) in Wistar Rats with Phenol, 2,2'-[(1-methyl-1,2-ethanediyl)bis(nitrilomethylidyne)]bis-)bis- (CAS No. 94-91-7), conducted by BASF SE, Ludwigshafen, Germany. The test substance is a metal deactivator for middle distillates for refinery industry and additive for adhesives.

The study has been performed with the dose levels of 0, 25, 75, or 250 mg/kg body weight/day via gavage with 10 male and 10 female rats per dose group.

The following findings were seen:

Total post-implantation loss occurred in two dams at 250 mg/kg bw /day. In addition, mean live litter size was lower in this group (8.3 live pups/litter compared to control: 11.0; 25 mg/kg bw./day: 10.2; 75 mg/kg bw./day: 12.4).

No compound-related reproductive effects were observed at 25 and 75 mg/kg bw./day.

BASF Corporation understands that reporting of the results from this study under TSCA 8(e) is in accordance with EPA's policy.

If you have any questions, please contact the undersigned at (973) 245-6693.

Sincerely,

Janet Cerra

Janet Cerra
Product Regulatory Center of Expertise, North America



1376th Letter.doc

BASF Corporation
100 Park Avenue
Florham Park, NJ 07932
Tel: (800) 526-1072
www.basf.com/usa

CONTAINS NO CBI

From: (973) 245-6693
 Janet Cerra
 BASF
 100 Park Avenue

Origin ID: LKKA

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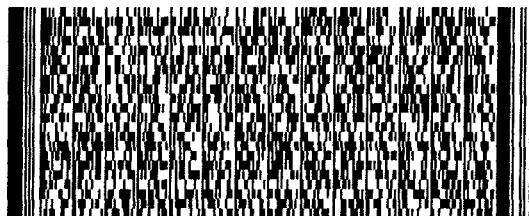
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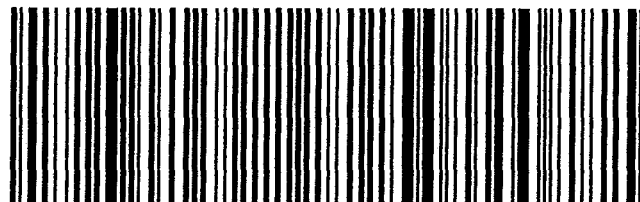
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